EXHIBIT A

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

UELIAN DE ABADIA-PEIXOTO, et. al,)
) No. 11-cv-4001 (RS)
)
Plaintiffs,)
) DECLARATION OF
v.) EDDIE ROBINSON
)
UNITED STATES DEPARTMENT OF)
HOMELAND SECURITY, et. al.,)
)
Defendants.)
)

Declaration of Eddie Robinson

- I, Eddie Robinson, declare as follows:
- 1. I am a Supervisory Detention and Deportation Officer with U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), San Francisco Field Office. My current duties include the supervision of ICE personnel responsible for the transportation of ICE detainees to and from ICE detention facilities throughout the San Francisco area of responsibility (AOR) and within the ICE detention facility located at 630 Sansome Street in San Francisco, California. I also conduct on-site visits to the ICE detention facilities throughout the AOR on a weekly basis and communicate with detainees and jail staff. During these visits, I ensure that the required ICE postings are viewable by detainees. I also talk to the detainees regarding any problems or requests they

- may have concerning their stay at the jail. I also receive written requests from detainees and ICE responds to such requests in writing.
- 2. I have prepared this declaration in connection with the Notice directed to Class Members referenced in paragraph 4 of the January 23, 2014 Preliminary Approval Order in *Uelian De Abadia-Peixoto v. U.S. Dept. of Homeland Security, et al.*
- 3. The Notice was posted in the English, Spanish, Chinese and Punjabi languages in "areas visible to immigration detainees in all facilities holding respondents appearing before the San Francisco Immigration Court." This includes postings at the ICE contract facilities, Contra Costa county jail, Yuba county jail, and Rio Consumnes Correctional Center (RCCC). The English, Spanish, Chinese, and Punjabi translations of the Notice were posted at Contra Costa county jail and RCCC on or before Thursday, January 30, 2014. The English, Spanish, and Chinese translations of the Notice were posted at Yuba county jail on or before Thursday, January 30, 2014, and for reasons set forth below in paragraphs 4 and 5, the Punjabi translation was posted on Monday, February 3, 2014. The Notice and all translations thereof remain posted.
- 4. Because the Plaintiffs' proposed Punjabi translation of the Notice was deficient, Defendant EOIR required more time to translate the document into Punjabi. The approved translation was not received by ICE until at or near close of business on January 30, 2014.
- 5. Due to the delay in receiving the Punjabi translation and technical difficulties at Yuba county jail, ICE was unable to post the Punjabi translation e-mailed to jail personnel on January 30, 2014. On Monday, February 3, 2014, ICE was notified

- of the technical difficulties at the jail and thereafter immediately faxed the Punjabi translation to the jail and it was posted that same day.
- 6. The Notice in English, Spanish, and Chinese was posted on the ICE website on or before Thursday, January 30, 2014. The Notice in Punjabi was posted on ICE's website on Friday, January 31, 2014. The Notice and all translations thereof remain posted on ICE's website.
- I am not aware of any class member requesting alternate format copies of the Notice.

I declare under the penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge.

March 66, 2014